

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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VICTOR LOPEZ,

Plaintiff,

Docket # 20-cv-03450

-against-

SHARAN K. PURI, FLORAISON, INC.,
METROPOLITAN WIRELESS BK121, INC., JOHN DOE
CORPORATION 1, and JOHN DOE DEFENDANT 1,

Defendant.

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PLEASE TAKE NOTICE, that upon the annexed Declaration of Ken Novikoff dated September 20, 2021, Declaration of Tammy Vorrasi dated September 20, 2021 and the accompanying Memorandum of Law, Defendant, METROPOLITAN WIRELESS BK121, (“Metropolitan”), by and through its attorneys, Rivkin Radler, LLP, will move this Court before Judge Ann M. Donnelly, at the Courthouse located at 225 Cadman Plaza East, Courtroom 4GN, Brooklyn, New York 11201, on a date to be determined, for an pursuant to Fed. R. Civ. P. 12(c), for judgment on the pleadings dismissing the claims for relief asserted against it in the Amended Complaint filed by Plaintiff, VICTOR LOPEZ, (“Plaintiff”), and to grant such other and further relief as this Court deems just and proper.

Dated: Uniondale, New York
September 20, 2021

Respectfully submitted,

RIVKIN RADLER LLP
Attorneys for Defendants
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